

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IVORY D. JOHNSON, Individually and
on behalf of all others similarly situated,

Plaintiff,

VS.

AVION SYSTEMS, INC.,

Defendant.

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CIVIL ACTION NO: 4:11-cv-02661

MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT

The law firm of Muskat, Martinez & Mahony, LLP hereby moves to withdraw as counsel for Defendant Avion Systems, Inc. in this matter. It is Muskat, Martinez & Mahony, LLP's understanding that Defendant is currently being counseled in this matter by the law firm of Lackland & Associates in Atlanta, Georgia, although that firm has not appeared as counsel of record in this case. Until such time as new counsel appears on behalf of Defendant in this matter, we would respectfully request that all pleadings, orders, and case-related correspondence be directed to Defendant's Chief Executive Officer, Kanchana Raman, with copies to the law firm of Lackland & Associates. Ms. Raman's and Lackland & Associates' addresses and contact information are listed below:

Ms. Kanchana Raman
Chief Executive Officer
Avion Systems, Inc.
200 Mansell Ct. East, Ste. 300
Roswell, GA 30076
(678) 777-5337
Kanchana.raman@avionsystems.com

Mr. Ted Lackland
Lackland & Associates, LLC

630 Village Trace NE
Building 15, Suite C
Atlanta, GA 30067
(404) 522-8155
tlackland@e-lacklaw.com

The undersigned counsel has advised Plaintiff's counsel that this motion to withdraw is forthcoming, and Plaintiff's counsel has been in touch with Lackland & Associates regarding the case.

The only deadline in the case applicable to Defendant is the Court's scheduling conference on November 18, 2011. Counsel does not believe that this withdrawal will prejudice Defendant, and counsel respectfully requests that the Court grant this Motion.

Respectfully submitted,

/s/Michael J. Muskat
Michael J. Muskat
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OF COUNSEL:

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CERTIFICATE OF SERVICE

I certify that a true a correct copy of the foregoing document was served via the Court's electronic mail system on counsel for Plaintiff on the 21th day of September, 2011. Copies have been forwarded by email and regular mail to Ms. Kanchana Raman, Defendant's Chief Executive Officer, and to Mr. Ted Lackland, Lackland & Associates, LLC, at the addresses listed above.

/s/Michael J. Muskat